

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Eboni M. Armour-Fraley Case No. 19-28445 Chapter 13

All Cases: Moving Creditor Consumer Portfolio Services, Inc. Date Case Filed 10/07/2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 1/9/2020

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

- a. ☐ Home
b. ☒ Car Year, Make, and Model 2015 Chrysler 200
c. ☐ Other (describe) _____

2. Balance Owed as of Petition Date \$ 18,370.50
Total of all other Liens against Collateral \$ 18,370.50

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 10,400.00

5. Default

- a. ☐ Pre-Petition Default
Number of months _____ Amount \$ 2,541.06
b. ☒ Post-Petition Default
i. ☒ On direct payments to the moving creditor
Number of months 3 Amount \$ 2,729.91
ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. ☒ Lack of Adequate Protection § 362(d)(1)
i. ☒ No insurance
ii. ☐ Taxes unpaid Amount \$ _____
iii. ☒ Rapidly depreciating asset
iv. ☐ Other (describe) _____
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
c. ☐ Other "Cause" § 362(d)(1)
i. ☐ Bad Faith (describe) _____
ii. ☐ Multiple Filings
iii. ☐ Other (describe) _____
d. Debtor's Statement of Intention regarding the Collateral
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: 1/24/2020

David J. Turiciano
Counsel for Movant